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Attorneys for Defendant  
JESUS RODRIGUEZ

**FILED**

DEC - 7 2005

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY                      DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	No. CR CR. S-04-0387 MCE
	)	
Plaintiff,	)	STIPULATION CONCERNING PROPERTY
	)	POSTED TO SECURE BOND
	)	
v.	)	
	)	
JESUS RODRIGUEZ,	)	
	)	
	)	
Defendant.	)	

The Court originally ordered the release of the defendant, Jesus Rodriguez upon the condition that he post four properties plus the inventory contained in his store as security for his bond. Mr. Rodriguez has posted the following properties (1) the property owned by his girl friend, Maria Chavez (Docket Number 26) (equity of \$120,000), (2) the property owned by his friend Salvador Macias Valenzuela (Docket Number 30) (equity of \$55,000), and the auto shop property located on B Street in Biggs, California (Docket Number 33) (equity of \$90,000). Additionally, the Defendant, Mr. Rodriguez, has provided the Government with a security agreement covering the inventory in the store (equity


1 of \$100,000) and the Defendant has made a UCC filing with the  
2 Secretary of State covering the security interest in favor of the  
3 United States in the inventory. The equity in these three properties  
4 and the inventory totals \$365,000.


5 The Defendant has been unable to post the Afton store property  
6 (equity of \$90,000) because his wife has refused to sign the Deed of  
7 Trust. The Defendant's wife originally advised Mr. Locke, attorney  
8 for Mr. Rodriguez, and Phil Davis, the Pre-trial Services Officer,  
9 that she would sign the Deed of Trust in return for Mr. Rodriguez  
10 signing over his interest in their home to her. Mr. Rodriguez has  
11 signed over his interest in the home to Mrs. Rodriguez but Mrs.  
12 Rodriguez, on advice of her attorney, now refuses to sign the Deed of  
13 Trust. Mr. and Mrs. Rodriguez are now going through a divorce and it  
14 is not possible to get Mrs. Rodriguez to sign the papers necessary to  
15 post the store property.

16 The United States, by and through its attorney, and the  
17 Defendant, by and through his attorney hereby stipulate that the  
18 Defendant's bond should be reduced to \$365,000 and that the properties  
19 currently posted and the inventory are sufficient to secure the  
20 amended bond in the amount of \$365,000.

21 DATED: December 6, 2005

Respectfully submitted,

22   
23 BRUCE LOCKE  
24 Attorney for Mr. Rodriguez

25   
26 PHILLIP TALBERT  
27 Attorney for the United States

28 IT IS SO ORDERED:

DATED: Dec 7 2005

  
UNITED STATES MAGISTRATE JUDGE